

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
TRENK, DiPASQUALE, WEBSTER, DELLA FERA & SODONO, P.C. 100 Executive Drive, Suite 100 West Orange, New Jersey 07052 (973) 243-8600 Joshua H. Raymond (JR2022) <i>Counsel for Plaintiff Donald V. Biase, Chapter 7</i> <i>Trustee for Pelican Pool & Ski Center, Inc.</i>	
In re:	Case No. 05-22983 (DHS)
PELICAN POOL & SKI CENTER, INC.,	Chapter 7
DONALD V. BIASE, Chapter 7 Trustee,	Adv. Pro. No. 07-1535 (DHS)
Plaintiff,	Judge: Honorable Donald H. Steckroth
v.	
RIPCURL,	
Defendant.	

APPLICATION FOR ENTRY OF DEFAULT

TO: HONORABLE DONALD H. STECKROTH
UNITED STATES BANKRUPTCY JUDGE

Donald V. Biase, Chapter 7 Trustee ("Trustee") for Pelican Pool & Ski Center ("Debtor"), by and through his attorneys, Trenk, DiPasquale, Webster, Della Fera & Sodono, P.C., hereby files and serves this application for the entry of a default pursuant to Fed. R. Civ. P. 55(a), Fed. R. Bankr. Pro. 7055(a), and D.N.J. LBR 7055(a), and shows unto the Court the following:

1. On April 18, 2007, the Trustee filed the within adversary proceeding against Ripcurl ("Defendant") seeking to avoid and recover pre-petition and post-petition transfers ("Complaint").

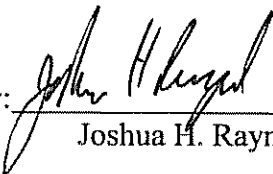
2. On or about April 26, 2007, Defendant was served with the Summons, copy of the Complaint, and Notice of Pretrial Conference via certified mail, return receipt requested, and first class mail, postage prepaid. A copy of the return receipt signed by a party of the Defendant evidencing its actual receipt of such mailing via certified mail is attached hereto as Exhibit "A."

3. Defendant has failed to plead or otherwise defend within the allowed time, and that time has now run.

4. Defendant has not requested nor has been granted an extension of time to plead or otherwise defend.

WHEREFORE, the Trustee hereby respectfully requests that the Clerk of the Bankruptcy Court enter a default pursuant to Fed. R. Civ. P. 55(a), Fed. R. Bankr. Pro. 7055(a), and D.N.J. LBR 7055-1(a), in the above-captioned adversary proceeding against Defendant Ripcurl.

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**
*Attorneys for Plaintiff Donald V. Biase,
Chapter 7 Trustee*

By: 
Joshua H. Raymond

DATED: July 9, 2007

Exhibit "A"

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p><input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p><input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.</p> <p><input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p style="margin-left: 40px;">Ripcurl 3030 Airway Avenue Costa Mesa, CA 92626 Attn: President, Managing Member, Authorized Agent or Responsible Officer</p>	<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>4/26</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p>2. Article Number (Transfer from service label)</p> <p style="margin-left: 40px;">7006 2760 0003 7466 2790</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. </p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com

OFFICIAL USE

<p>Postage \$</p> <p>Certified Fee</p> <p>Return Receipt Fee (Endorsement Required)</p> <p>Restricted Delivery Fee (Endorsement)</p> <p>Total Paid</p>	<p>Postmark Here</p>
--	----------------------

Sent To: Ripcurl
 3030 Airway Avenue
 Costa Mesa, CA 92626
 Attn: President, Managing Member,
 Authorized Agent or Responsible Officer

Street, Apt or PO Box
 City, State, ZIP+4

PS Form 3800, August 2005 See Reverse for Instructions